



Fw: Re: Draft Responses to ProPublica Qs
Dennis Carney to: Terri-A White, Roy Seneca
Cc: "Ron Borsellino", "Jerry Heston"

03/30/2012 09:14 AM

From: Dennis Carney/R3/USEPA/US
To: "Terri-A White" <White.Terri-A@epamail.epa.gov>, "Roy Seneca" <seneca.roy@epa.gov>
Cc: "Ron Borsellino" <borsellino.ron@epa.gov>, "Jerry Heston" <heston.gerald@epa.gov>

Terri and Roy, this is OSWER's OK. Looks like we are good to go with the responses to Propublica. Thanks, dennis.

From: Dana Tulis
Sent: 03/29/2012 11:44 PM EDT
To: Gilberto Irizarry; "Mathy Stanislaus" <stanislaus.mathy@epa.gov>; Lisa Feldt
Cc: Dennis Carney; EOC Environmental Unit; Larry Stanton
Subject: Re: Re: Draft Responses to ProPublica Qs

Thanks Tito and Dennis, I have no further comments, these are well done. I am adding in Mathy and Lisa for awareness only.

Dana S. Tulis
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-----Gilberto Irizarry/DC/USEPA/US wrote: -----
To: Dennis Carney/R3/USEPA/US@EPA, EOC Environmental Unit@EPA
From: Gilberto Irizarry/DC/USEPA/US
Date: 03/29/2012 06:10PM
Cc: Dana Tulis/DC/USEPA/US@EPA
Subject: Re: Draft Responses to ProPublica Qs

Dennis:

I do not have Janine available today or tomorrow, but Terry and I have looked at these. We noted that some of the questions relate to the detection/quantification/detection issue in the data result sheets. I know that the technical staff also discussed this yesterday.

We did not identify questions and/or concerns. Dana T. is going to give these a quick review a bit later this evening and will pass on any feedback. Otherwise, assume that these are good by us.

Thanks,

Tito

Sent by Blackberry. Please excuse typos.

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Dennis Carney

----- Original Message -----
From: Dennis Carney
Sent: 03/29/2012 02:18 PM EDT
To: EOC Environmental Unit
Cc: Gilberto Irizarry
Subject: Fw: Draft Responses to ProPublica Qs

We are hoping to get answers to the first 8 questions below out to the report at Propublica, this afternoon or early tomorrow at the latest. HQ-OEA has asked that we run the region's response past OSWER concurrent with a review OEA is doing.

Any comments, please advise or call me with concerns. Thanks, dennis.

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----- Forwarded by Dennis Carney/R3/USEPA/US on 03/29/2012 02:13 PM -----

From: Terri-A White/R3/USEPA/US
To: alcantara.betsaida@epa.gov, David Bloomgren/DC/USEPA/US@EPA
Cc: seneca.roy@epa.gov, Dennis Carney/R3/USEPA/US@EPA, kulik.michael@epa.gov
Date: 03/29/2012 01:28 PM
Subject: Draft Responses to ProPublica Qs

Betsaida, David,

Here are draft responses to the last set of Qs, Abrahm submitted. Please advise. -- Terri

QUESTION 1) At this point, I'm looking hard at the detection limits. I'm left to speculate here, but I'm now guessing perhaps your system snafus prevented the J's from showing up on minute detections. But that raises other questions: Why are you listing estimated detections several orders of magnitude away from your detection limits?

It is correct that "J" qualifiers were omitted from the original data package provided to the first 11 residents. Residents received updated, corrected packages. It's important to note that none of the actual results changed.

QUESTION 2) If the detection limits are expressed accurately, how would that be possible? For instance, in one test benzo(a)pyrene is listed non-detect, with a "U" and a detection limit of 5ug/L. In another test it was listed as "detected" at .05 ug/L. (now in the new version it is estimated at .05ug/L "J").

It is possible for the laboratory to "see" results below the stated detection limit. This means that some amount of the compound in question was detected and can be reasonably estimated even though it could not be accurately quantified by the lab instrument ("J" qualifier = estimated value).

QUESTION 3) And by the same token, why are all the detection limits more or less the same - and relatively high? Wouldn't they be different for different substances?

Analytical methods are established for classes of compounds. Benzo(a)pyrene and other poly-aromatic hydrocarbons (PAHs) are classified as semi-volatile compounds, and there is usually a common detection limit for each class of compounds according to the method. Detection limits would vary by class of compound and analytical method.

QUESTION 4) And for Benzo(a)pyrene, which has an MCL of .20 ug/L max, why would a detection limit of 5.0 ug/L be acceptable?

The detection limits listed in the data reports are typically what the laboratory would call a quantitation limit. Quantitation limits are established by the analytical method and instrumentation capabilities and are the minimum concentration of an analyte that can be measured within specified limits of precision and accuracy. Classes of compounds are generally analyzed using the same laboratory method. Benzo(a)pyrene and other poly-aromatic hydrocarbons (PAHs) are classified as semi-volatile organic compounds, which were analyzed using Method 8270D, with a quantitation limit (QL) of 5 ug/l; which as acknowledged is higher than the MCL. With that said lab personnel can typically detect that a chemical is present at values below the QL and can reasonably estimate a concentration that is then reported and validated. In this case the lab is confident that they could detect at levels below both the QL and the MCL. Because the value cannot be precisely stated from the instrument, it is qualified as "J", estimated.

QUESTION 5) Finally... items exceeding the trigger level have been forwarded to a toxicologist, I understand, but why wouldn't the one 2.0 ug/L estimated detection of benzo(a)pyrene in HW04 have been sent to a toxicologist?

All results are reviewed by an EPA toxicologist. We do not have a 2.0 ug/L result for benzo(a)pyrene in HW-04 as mentioned; rather, we have 0.05 ug/L with a "J" qualifier for HW-04.

QUESTION 6) Were these all done by the same lab?

All of the PAHs were analyzed at EPA's laboratory in Fort Meade, Maryland. Other analyses were split up among several EPA labs and some private labs.

QUESTION 7) Were there different methods applied to different tests or for different substances?

Yes. The sampling plan is posted on the EPA website (http://www.epaosc.org/dimock_residential_groundwater) and identifies the lab and methods for analyses.

QUESTION 8) Is any of this background technical information releasable? (Surely it can't have privacy concerns attached to it)

**Most of this information is readily available on EPA's Dimock website.
http://www.epaosc.org/dimock_residential_groundwater**

QUESTION 9) Bigger picture: My impression here is that the EPA has not done a very careful job of quality testing this data, or explaining it to residents, or even going over it before releasing it, and I'm curious whether that is the case and why?

EPA has been reviewing data as they are received. There are 61 home wells that have been sampled for over 200 parameters.

At some homes we took multiple samples (ie. at the well, at the tap, duplicates, etc.) plus due to the volume of samples, the analyses had to be split up among several different laboratories. In short, there was a lot of data that needed to be consolidated to create individual homeowner reports. We have been working hard to avoid any issues with presenting the data, but acknowledge there were some errors related to the display of results on the spreadsheet. It's important to note that none of the actual results changed.

With regard to explaining the results with the homeowner, we have been very careful to share the data, provide time for them to become familiar with the package, then schedule meetings to discuss the results in detail and to offer a health consultation with ATSDR, if desired.

QUESTION 10) You must have expected close scrutiny of the material. Was the first version just run out of your system and given to residents without being reviewed/confirmed? What was done after that that resulted in the second versions?

As noted we found and corrected errors caused by poor column alignment on the spreadsheet and printing. We hand delivered corrected packages to the homeowners. the lab results remained unchanged as did our conclusions that the private wells sampled did not present a health concern.

QUESTION 11) Why was the material released before the other 50 homes were analyzed?

Because of the large number of homes sampled it took almost 4 weeks to complete the initial sampling. In fairness to citizens who wanted to know their results as soon as possible, we decided to roll-out data in weekly batches, The batches correspond to the order in which homes were sampled (11 the first week, 20 the second, etc.).